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29 Plaintiffs' Co-Lead Class Counsel

30 **UNITED STATES DISTRICT COURT**

31 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

32 AARON SENNE, et al., Individually and on  
 33 Behalf of All Those Similarly Situated,

34 Plaintiffs,

35 vs.

36 OFFICE OF THE COMMISSIONER OF  
 37 BASEBALL, an unincorporated association  
 38 doing business as MAJOR LEAGUE  
 39 BASEBALL; et al.;

40 Defendants.

41 Case No. 3:14-cv-00608-JCS  
 42 (consolidated with No. 3:14-cv-03289-JCS)  
 43 Assigned to: Hon. Joseph C. Spero

44 **CLASS ACTION**

45 **STIPULATION AND [PROPOSED]  
 46 ORDER EXTENDING DEADLINE FOR  
 47 FILING MOTION FOR PRELIMINARY  
 48 APPROVAL**

1 WHEREAS the parties previously reached a settlement of the case in principle, *see* ECF  
2 No. 1122;

3 WHEREAS the Court previously set a deadline of July 11, 2022 for Plaintiffs to file their  
4 motion for preliminary approval, ECF No. 1123;

5 WHEREAS the parties have agreed to a confidential memorandum of understanding,  
6 which remains confidential, regarding the proposed settlement;

7 WHEREAS the Court set a case management conference for August 19, 2022 at 2:00 p.m.,  
8 ECF No. 1123;

9 WHEREAS the parties have worked diligently towards finalizing the proposed settlement  
10 documents and preparing the motion for preliminary approval and supporting papers, but a short  
11 four-day extension is needed to finalize and execute these documents;

12 WHEREAS an extension of time for filing the motion for preliminary approval from July  
13 11, 2022 to July 15, 2022 would still provide 35 days between the filing of the motion and the  
14 August 19 case management conference in accordance with local rules;

15 WHEREAS the signature of Defendants' counsel, Elise M. Bloom, shall be sufficient to  
16 bind all of the Defendants to the terms of this stipulation and any court order resulting from it.

17 THE PARTIES STIPULATE AS FOLLOWS:

18 The deadline for Plaintiffs to file their motion for preliminary approval shall be continued  
19 until July 15, 2022.

21 DATED: July 7, 2022

Respectfully submitted,

22 /s/ Garrett R. Broshuis

23  
24 PEARSON, SIMON & WARSHAW LLP  
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Daniel L. Warshaw  
Bobby Pouya  
Benjamin E. Shiftan  
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1 KOREIN TILLERY, LLC  
2 Stephen M. Tillery  
3 Garrett R. Broshuis  
4 Marc Wallenstein  
5 Diane Moore

6 *Plaintiffs Co-Lead Class Counsel*

7 DATED: July 7, 2022

8 /s/ Elise M. Bloom

9 PROSKAUER ROSE LLP  
10 Elise M. Bloom  
11 Neil H. Abramson  
12 Adam M. Lupion  
13 Mark W. Batten  
14 Rachel Philion  
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19 *Attorneys for Defendants*

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22 SHERMAN OAKS, CALIFORNIA 91403

**FILER'S ATTESTATION**

I, Garrett Broshuis, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order Extending the Deadline for Filing Motion for Preliminary Approval. I hereby attest that the counsel listed above concur in this filing. I will maintain an executed copy of this pleading in our files that can be made available for inspection upon request.

Dated: July 7, 2022

*/s/ Garrett R. Broshuis*

Garrett R. Broshuis

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SHERMAN OAKS, CALIFORNIA 91403

## [PROPOSED] ORDER

The Court, having considered the parties' stipulation, and cause appearing, IT IS HEREBY ORDERED that:

The deadline for Plaintiffs to file their motion for preliminary approval shall be continued until July 15, 2022.

DATED: July 7, 2022

  
HONORABLE JOSEPH C. SPERO  
Chief Magistrate Judge

PEARSON, SIMON & WARSHAW, LLP  
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